

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION**

IN RE HELEN RACANELLI	:	x
	:	
Debtor.	:	Case No. 16-22617-rdd
	:	
	:	Adv. No. 16-08254-rdd
	:	
HELEN RACANELLI	:	
	:	
Plaintiff,	:	NOTICE OF DEFENDANTS BANK OF
	:	AMERICA, N.A. AND RECONTRUST
v.	:	COMPANY, N.A.’S MOTION TO
	:	DISMISS PLAINTIFF’S COMPLAINT
BANK OF AMERICA, N.A., NATIONSTAR	:	
MORTGAGE LLC, U.S. BANK NATIONAL	:	
ASSOCIATION, AS TRUSTEE FOR GSAA	:	
HOME EQUITY TRUST 06-00019, ASSET-	:	
BACKED CERTIFICATES, SERIES 06-00019,	:	
AND RECONTRUST	:	
	:	
Defendants.	:	
	:	x

PLEASE TAKE NOTICE that, the undersigned counsel for Defendants Bank of America, N.A. (“BANA”) and Recontrust Company, N.A. (“Recontrust, and collectively with BANA the “BANA Defendants”) shall move before the Honorable Robert D. Drain, United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York, at 10:00 a.m. on March 8, 2017, for entry of an Order granting BANA Defendants’ Motion to Dismiss the November 29, 2016 (“Complaint” or “Compl.”) of Plaintiff Helen Racanelli (“Plaintiff”) with prejudice, pursuant to Fed. R. Civ. P. 12(b)(6) on the grounds that the Complaint fails to state a claim upon which relief may be granted.

PLEASE TAKE FURTHER NOTICE that in support of said Motion, the BANA Defendants will rely upon the Memorandum of Law and Affirmation of Heather Elizabeth Saydah, dated January 20, 2017.

WINSTON & STRAWN, LLP

BY: /s/Heather Elizabeth Saydah
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N.A. and Recontrust Company, N.A.*

Dated: New York, NY
January 20, 2017